

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 3993/July 15, 2016

ADMINISTRATIVE PROCEEDING
File No. 3-17032

In the Matter of

BUNCOMBE, INC.,
COTTON BAY HOLDINGS, INC.,
MIDDLESEX INC., and
REON HOLDINGS, INC.

ORDER TO SHOW CAUSE

On December 30, 2015, the Securities and Exchange Commission issued an order instituting proceedings (OIP) pursuant to Section 12(j) of the Securities Exchange Act of 1934, alleging that Respondents have securities registered with the Commission and are delinquent in their periodic filings. An initial decision issued as to Respondents Buncombe, Inc., Cotton Bay Holdings, Inc., and Middlesex Inc. *Buncombe, Inc.*, Initial Decision Release No. 950, 2016 SEC LEXIS 386 (ALJ Feb. 3 2016). The initial decision did not apply to REON Holdings, Inc., because service had not been established as to that respondent. *Id.* at *1 n.1.

On July 6, 2016, the Division of Enforcement filed evidence that on June 27, 2016, service of the OIP was attempted on REON in China through the Chinese central authority, pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents. The address where service was attempted does not exist, according to the Chinese central authority's statement in the Division's filing, but is the one shown on REON's most recent filing with the Commission. As such, I find that REON was served on June 27, 2016, by a "method reasonably calculated to give notice," in accordance with 17 C.F.R. § 201.141(a)(2)(iv). Therefore, REON's answer was due by July 7, 2016. OIP at 3; 17 C.F.R. §§ 201.160(a), .220(b). To date, REON has not filed an answer or otherwise defended this proceeding.

Accordingly, I ORDER REON Holdings, Inc., to SHOW CAUSE by July 25, 2016, why the registration of its securities should not be revoked by default due to its failure to file an answer or otherwise defend the proceeding. If REON fails to respond to this order, I will deem it in default, determine the proceeding against it, and revoke the registration of its securities. *See* OIP at 3; 17 C.F.R. §§ 201.155(a)(2), .220(f).

Brenda P. Murray
Chief Administrative Law Judge